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18 *Group, Inc. d/b/a Fortress Block Chain*
Technologies, and Planet NFT, Inc.
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

21 BANQ, INC., a Florida corporation,,
22 Plaintiff,
23 v.

24 SCOTT PURCELL, an individual, GEORGE
GEORGIADES, an individual, KEVIN
25 LEHTINIITTY, an individual, FORTRESS
NFT GROUP, INC. d/b/a FORTRESS
26 BLOCK CHAIN TECHNOLOGIES, a
Delaware corporation, and PLANET NFT,
27 INC., a Delaware corporation,
28 Defendants.

Case No. 2:22-cv-00773-APG-DJA

**STIPULATION AND ORDER
EXTENDING DEADLINES TO FILE AN
AMENDED COMPLAINT AND TO
RESPOND TO THE OPERATIVE
COMPLAINT**

[FIRST REQUEST]

Pursuant to Local Rules IA 6-1 and 7-1, Plaintiff Banq, Inq. (“Plaintiff”) and Defendants Scott Purcell, George Georgiades, Kevin Lehtiniity, Fortress NFT Group, Inc., and Planet NFT Inc. (collectively, “Defendants”) (together, the “Parties”), by and through their counsel, respectfully submit this Joint Stipulation and Order Extending Deadlines to Serve an Amended Complaint and to Respond to the Operative Complaint.

WHEREAS, on November 13, 2024, Magistrate Judge Albregts entered a scheduling Order setting an August 25, 2025 deadline for the Parties to “Amend pleadings/Add parties,” Dkt. 110;

WHEREAS, on December 20, 2025, Defendants filed a Motion to Dismiss Plaintiff’s Complaint, Dkt. 110;

WHEREAS, on July 29, 2025, the Court entered an Order Granting In Part Defendants’ Motion to Dismiss Plaintiff’s Complaint, Dkt. 145;

WHEREAS, the Court’s July 29, 2025 order set an August 28, 2025 deadline for Plaintiff to serve an amended complaint, Dkt. 145;

WHEREAS, the Parties understand the Court’s July 29, 2025 order, Dkt. 145, to have extended the prior August 25, 2025 deadline to “Amend pleadings/Add parties” to such time until Plaintiff serves an amended complaint (if any) and Defendants respond to Plaintiff’s operative complaint;

WHEREAS, Defendants’ response to Plaintiff’s operative complaint is due on September 11, 2025;

WHEREAS, the Parties are scheduled to engage in a mediation in Las Vegas, Nevada on September 12, 2025;

WHEREAS, the Parties agree that their efforts to engage in a productive mediation would be aided by an extension of deadlines that would allow Plaintiff to prepare and serve an amended complaint (if any) soon after the September 12, 2025 mediation, and that would allow Defendants to respond to Plaintiff’s operative complaint soon thereafter;

WHEREAS, the Parties propose that Plaintiff’s deadline to amend its complaint be extended from August 28, 2025 to September 29, 2025 (approximately two weeks after the September 12,

2025 mediation), and that Defendants' deadline to respond to Plaintiff's operative complaint be extended from September 11, 2025 to October 13, 2025;

WHEREAS, this is the first request by the Parties for an extension of time for Plaintiff to serve an amended complaint, and for Defendants to respond to Plaintiff's operative complaint;

NOW THEREFORE, IT IS HEREBY STIPULATED by and between the Parties, by their respective counsel, that with the permission of the Court, Plaintiff's deadline to serve an amended complaint shall be September 29, 2025, and Defendants' deadline to respond to Plaintiff's operative complaint shall be October 13, 2025.

Dated this 7th day of August, 2025.

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IT IS SO ORDERED:



DANIEL J. ALBRECHTS
UNITED STATES MAGISTATE JUDGE

DATED: 8/11/2025